Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Part 73 of the	)	
Commission's Rules to Permit	)	Docket No.: **MM DOCKET NO. 99-325**
The Introduction of Digital Audio	)	
Broadcasting in the AM	)	
And FM Broadcast Services	)	

MOTION TO ENLARGE ISSUE

John Pavlica, Jr.

August 21, 2003

As an American consumer, as an electrical engineer, and as a licensed Amateur Radio operator, I respectfully request our FCC to enlarge the issue of testing **multiple** proposed terrestrial broadcasting and receiving methods concerning the AM and FM broadcast bands in the United States, and not limiting this issue to only one proposed system. It is my engineering opinion that several systems should be tested, and not just the iBiquity Digital Corporation IBOC – HD Radio

system, particularly in the AM (medium-wave) band. In addition, the end result of testing may show that consumers may benefit more from digitally-enhanced **receiver** improvement options, rather then digital broadcasting methods.

I've read with great interest two petitions located under "PRM03MB" filed by a Mr. Leonard R. Kahn of Kahn Communications. I believe that Mr. Kahn's petitions have great merit and I suggest you grant his request for a Notice Of Inquiry regarding AM broadcasting. I also concur with his comments filed that recommend that a 'blue ribbon panel' be formed to evaluate all AM band improvements before the FCC rushes to approve a single system that potentially causes adjacent channel interference. I agree with Mr. Kahn that several AM systems should be evaluated, but in addition to his proposed Kahn D-Cam AM enhanced system, I believe we should also test the non-proprietary international shortwave and medium-wave digital standard DRM, as well as an improved iBiquity HD radio. This 'AM blue ribbon panel' should also review receiver mandates such as requiring AMAX stereo compliance or by utilizing digital receiver enhancements such as the Omega or Symphony systems in place of, or in addition to, transmitting improvements for the AM band.

I also believe that we need to 'think outside the box' on the AM band. Some consideration should be given to even reshuffling the AM band as was done in the 1940's. Perhaps we need to further enhance the AM band's main strength: a single station per frequency, 1-A clear-channel arrangement that covers many states at night. Maybe even consider allowing clear channel 1-A stations to increase their analog power from 50,000 watts up to 500,000 watts, as was done with WLW at one time? Perhaps we need half of the AM band just for local/regional and half for the

500KW clear channel super-power stations? Could a committee investigate a separate VHF or UHF frequency band for moving all low-power local AM stations to a new digital-only VHF/UHF band, and leave analog AM for only the 500KW super-power stations but with new 30KHz channel spacing and restore audio frequency response to 15KHz?

I would like to suggest that all previous and existing AM transmitting modes should be grandfathered and allowed to continue indefinitely (i.e.: C-Quam, Kahn ISB and Harris). I believe the FCC should mandate that an analog main channel (with at least 8 KHz analog frequency response) be required for compatibility with the hundreds of millions of analog AM receivers in the interest of national security. Whatever method of AM improvement is recommended by the 'blue ribbon panel' (AM receiving, AM broadcasting improvements, or even a new digital-only band for existing local AM broadcasters), first and foremost it must continue to allow for AM broadcasters to transmit their analog audio signal and without adjacent channel interference on the AM band, nor interfere with our neighbors in Canada and Mexico.

In my January 10, 2003 "Motion to Dismiss" filing, I requested that our FCC take immediate action on the monopolistic iBiquity system and its poor AM audio performance as I stated: "…*before stations invest in potentially flawed broadcasting systems*". It appears that others have also agreed with my January 10th opinion about the poor quality of the iBiquity system, as indicated in this statement issued May 15, 2003 by the National Radio Systems Committee (NAB/CEA) and their DAB Subcommittee: "…*As a result of growing concerns over the audio quality of iBiquity's low bit-rate codec, the NRSC DAB Subcommittee is temporarily suspending its IBOC DAB standards-setting process. This action is being taken, by unanimous approval of the DAB Subcommittee's*

Steering Committee…". In addition to my January 10th objections and those of the NRSC as to the poor performance of the iBiquity AM sound, even iBiquity issued this statement:
"Due to some specific concerns about the current state of the AM audio quality, the NRSC has temporarily suspended standard setting efforts for IBOC digital broadcasting. At this time, we concur with their decision to temporarily delay these efforts until the issue is resolved". Even the vendor realizes that their system is not broadcast quality, but meanwhile no other AM systems are being tested? Multiple AM systems must be evaluated by the FCC / 'blue ribbon committee'.

I urge you to enlarge the issue of terrestrial broadcasting improvements to include several different transmission improvements as well as receiver improvements from different vendors. It is my opinion that there is too much at stake to only test one proposed system that can greatly affect our US broadcasting bands for years to come without examining multiple options.

Thank you for allowing me to voice my opinions.

Respectfully submitted,

John Pavlica, Jr.